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Attorneys for defendant
DAVID CAMPOY

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,)	No. CR 20-0458 BLF
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER CONTINUING STATUS
vs.)	CONFERENCE DATE FROM MAY
)	10, 2022 TO JULY 26, 2022
DAVID CAMPOY, et al)	
)	
)	
)	
Defendants.)	
)	
)	

1. This matter is set for a status hearing on May 10, 2022 at 9:00 AM.
The 23-count Second Superseding Indictment charges fifteen defendants with a
variety of drug trafficking and firearms offenses. The case involves a substantial

1 volume of discovery, including multiple wiretaps, and has previously been found to
2 be complex for Speedy Trial Act purposes.

3 2. The government has been producing discovery on a rolling basis.
4 Recently, the government provided new discovery to a subset of defense counsel, and
5 anticipates producing that same material to all defense counsel in the coming weeks.

6 3. Defense counsel anticipates additional discovery requests based on the
7 review of the materials already provided. Both sides continue to meet and confer on
8 discovery obligations.

9 4. Finally, although not a statutory basis for exclusion of time from the
10 Speedy Trial Act, various parties are actively engaging in settlement negotiations
11 with the government, and additional resolutions are expected before the July 26, 2022
12 proposed date.

13 5. The parties stipulate that the ends of justice served by granting the
14 requested continuance outweigh the best interest of the public and the defendants in a
15 speedy trial, given the need for effective preparation of counsel.

16 For the above reasons, the parties respectfully request that the date of May 10,
17 2022 be vacated, and that the matter be re-set for a status conference on July 26, 2022
18 at 9:00 A.M.

19 **IT IS SO STIPULATED.**

20 DATED:

_____/s/_____
ALEXANDRA SHEPARD
Assistant United States Attorney

21
22
23 DATED

_____/s/_____
PETER LEEMING
Attorneys for David Campoy

1 DATED: _____/s/_____
2 DOUGLAS RAPPAPORT
3 Counsel for Defendant David Greenman

4 DATED: _____/s/_____
5 SEVERA KEITH
6 Counsel for Defendant Kimberly Carrasco

7 DATED: _____/s/_____
8 JACK GORDON
9 Counsel for Defendant Miguel Carrizal
10 Zamora

11 DATED: _____/s/_____
12 RICHARD WEESE,
13 Counsel for Defendant Jose Rodriguez
14 Naranjo

15 DATED: _____/s/_____
16 NAOMI CHUNG
17 Counsel for Defendant Nicholas Ardanuy

18 DATED: _____/s/_____
19 JERRY FONG
20 Counsel for Defendant Ignacio Espinoza

21 DATED: _____/s/_____
22 ROBERT CAREY
23 Counsel for Defendant Juan Johel Padilla

24 DATED: _____/s/_____
25 ALFREDO MORALES
Counsel for Defendant Luis Sendino

DATED: _____/s/_____
ROBERT LYONS
Counsel for Defendant Michael Osuna
Guizar

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3 **IN THE UNITED STATES DISTRICT COURT**
4 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
5 **SAN JOSE DIVISION**
6


7 UNITED STATES OF AMERICA,) No. 20 CR-0458 BLF
8 Plaintiff,) ~~[PROPOSED]~~ ORDER
9 vs.) CONTINUING STATUS
10 DAVID CAMPOY, et al,) CONFERENCE DATE
11)
12 Defendants.)
13)
14)

15 GOOD CAUSE APPEARING, it is hereby Ordered that the status conference
16 set for May 10, 2022 the above matter is continued to July 26, 2022 at 9:00 A. M. for
17 status.

18 The time between May 10, 2022 and July 26, 2022 is excluded from the
19 Speedy Trial Act due to the need for defense investigation and effective preparation
20 of counsel. Furthermore, the Court finds that the ends of justice served by granting
21 the requested continuance outweigh the best interest of the public and the defendant
22 in a speedy trial. The Court therefore concludes that this exclusion of time should be
23 made under 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

24 It is so Ordered.

25 Dated: May 5, 2022


The Hon. Beth Labson Freeman United
States District Court Judge